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Via ECF

August 15, 2023

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

*Re: In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (GBD)(SN); *Laurence Schlissel, et al. v. Islamic Republic of Iran*, No. 1:18-cv-05331 (GBD)(SN); *Susan M. King, et al. v. Islamic Republic of Iran*, No. 1:22-cv-05193 (GBD)(SN)

Dear Judge Netburn:

We write regarding our pending motion for partial final default judgments against the Islamic Republic of Iran ("Iran") for non-U.S. nationals, filed on June 16, 2023, ECF No. 9135. In light of Your Honor's Opinion and Order, ECF No. 9287, we wish to withdraw the motion for partial final default judgments against Iran for a subset of our non-U.S. national clients that is pending at ECF No. 9135 because that motion is substantively similar to the motion at ECF Nos. 8631-34 that Your Honor recently denied with permission to re-file. We do not wish to withdraw the motion for partial final default judgment against Iran for our non-U.S. national personal injury client that is pending at ECF No. 9152 because that motion stated that New York common law applies to that plaintiff's claims. *See* Memorandum of Law, ECF No. 9155 at 17-19. We intend to include the plaintiffs on the motion pending at ECF No. 9135 in a revised motion that addresses the Court's concerns in Your Honor's Opinion and Order at ECF No. 9287.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry Goldman

Jerry S. Goldman, Esq.

*Attorney for the Plaintiffs*

Cc (via ECF): The Honorable George B. Daniels; All MDL Counsels of Record

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